

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kathy A. Jacobs Raymond P. Jacobs Jr.  Debtors	BK. NO. 15-20277 TPA
MidFirst Bank, its successors and/or assigns Movant	CHAPTER 13
v. Kathy A. Jacobs Raymond P. Jacobs Jr.  Respondent	RELATED TO DOCKET NO. 65
and Ronda J. Winnecour, Trustee  Additional Respondent	

**EXHIBIT**

**/s/ Joshua I. Goldman, Esquire**

Joshua I. Goldman, Esquire

[jgoldman@kmlawgroup.com](mailto:jgoldman@kmlawgroup.com)

Attorney I.D. No. 205047

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106

Phone: 215-825-6306, Fax: 215-825-6406

Attorney for Movant/Applicant

Date: September 22, 2016

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Kathy A. Jacobs  
Raymond P. Jacobs Jr.  
Debtors

MidFirst Bank  
Movant  
vs.

Kathy A. Jacobs  
Raymond P. Jacobs Jr.  
Respondents

and Ronda J. Winnecour, Trustee  
Additional Respondent

Chapter 13

NO. 15-20277 TPA

**AFFIDAVIT**

I, Crystal Baker, employed as Vice President by MidFirst Bank hereby certifies that the records of MidFirst Bank for Respondents, Kathy A. Jacobs and Raymond P. Jacobs Jr., have been adjusted to remove insurance advances (non-escrow) in the amount of \$1,287.00 and the charge for the Motion to Allow Late Claim in the amount of \$350.00.

Date: 9.9.16

By: Crystal Baker  
Crystal Baker  
Vice President

STATE OF Oklahoma )  
COUNTY OF Oklahoma )

SS:

On the 9<sup>th</sup> day of September in the year of 2016, before me, the undersigned, personally appeared Crystal Baker, known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he/she executed the same in his/her capacity, and that by his/her signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed this instrument.



Ted Snoddy  
Notary Public

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Kathy A. Jacobs  
Raymond P. Jacobs Jr.  
Debtors

CHAPTER 13

MidFirst Bank  
Movant  
vs.

NO. 15-20277 TPA

Kathy A. Jacobs  
Raymond P. Jacobs Jr.  
Respondents

Ronda J. Winnecour, Trustee  
Additional Respondent

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I served or caused to be served, on **September 9, 2016**, a copy of the Affidavit of Default, filed herewith upon each of the following persons and parties in interest at the addresses shown below:

Ronda J. Winnecour  
Suite 3250, USX Tower (VIA ECF)  
600 Grant Street  
Pittsburgh, PA 15219  
cmecf@chapter13trusteedpa.com

Lawrence W. Willis Esquire  
201 Penn Center Blvd  
Suite 400  
Pittsburgh, PA 15235  
help@urfreshstr.com

Kathy A. Jacobs  
2877 North Meadow Street  
Natrona Heights, PA 15065

Raymond P. Jacobs Jr.  
2877 North Meadow Street  
Natrona Heights, PA 15065

Method of Service: Mail first class; Specify if other:

Date: September 9, 2016

/s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire  
[jgoldman@kmlawgroup.com](mailto:jgoldman@kmlawgroup.com)  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Attorney for Movant/Applicant

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
Proposed Order Page 1 of 1

In re:	)	
Raymond P. Jacobs, Jr.	)	Case No.: 15-20277TPA
Kathy A. Jacobs	)	Chapter 13
Debtor(s)	)	
<hr/>		
Ronda J. Winnecour, Chapter 13	)	
Trustee,	)	
	)	
Movant,	)	
	)	
Vs.	)	
MidFirst Bank	)	
Respondent(s)	)	

ORDER

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2016, upon consideration of Trustee's Objection to Notice of Postpetition Mortgage Fees, Expenses and Charges, it is hereby

ORDERED that the Notice of Postpetition Mortgage Fees, Expenses and Charges filed by MidFirst Bank on March 18, 2016 be reduced to the amount of \$250.00. It is further

ORDERED that the Respondent is to provide to the Court proof that the records have been adjusted to remove the Insurance advances (non-escrow) in the amount of \$1,287.00 and the charge for the Motion to Allow Late Claim in the amount of \$350.00 no later than 60 days from the date of this Order. The proof must include a notarized affidavit by a corporate officer reflecting that the charges have been removed as well as a full and comprehensible loan history from the inception of the loan. It is further

ORDERED that in the event that the creditor choses to withdraw the Notice of Postpetition Mortgage Fees, Expenses and Charges, the Respondent provide proof at the time of the withdrawal that the records have been corrected to show that there are no charges for the amounts claimed in the Notice. It is further

ORDERED that no additional charges will be assessed for defending the objection or for compliance with this Order.

BY THE COURT:

\_\_\_\_\_  
U.S. Bankruptcy Judge



Loan Number  
Mortgagor  
Case #  
Date  
Prepared By  
Teller #

RAYMOND PAUL JACOBS JR  
15-20277-13  
9/1/2016  
283

Transaction Date	Transaction Amount	Reference Number	Post Petition Date	Contractual Date	Transaction Type	Fee Detail	Transaction Detail	Suspense Amount
1/20/2015	501.30			1/1/2015	PAYMENT		501.30	-
8/3/2015	352.75				SUSPENSE		352.75	352.75
8/12/2015	62.94				SUSPENSE		62.94	415.69
8/12/2015	-85.00				SUSPENSE		-85.00	330.69
8/12/2015	85.00				FEE	INSPECTION FEES	85.00	330.69
9/1/2015	117.17				SUSPENSE		117.17	447.86
9/1/2015	-18.69				SUSPENSE		-18.69	429.17
9/1/2015	18.69				FEE	BANKRUPTCY INTEREST	18.69	429.17
10/2/2015	113.78				SUSPENSE		113.78	542.95
10/13/2015	-501.04				SUSPENSE		-501.04	41.91
10/13/2015	501.04			2/1/2015	PAYMENT		501.04	41.91
11/7/2015	112.64				SUSPENSE		112.64	154.55
11/11/2015	-154.55				SUSPENSE		-154.55	-
11/11/2015	154.55				ESCROW		154.55	-
12/10/2015	115.52				SUSPENSE		115.52	115.52
12/10/2015	-16.76				SUSPENSE		-16.76	98.76
12/10/2015	16.76				FEE	BANKRUPTCY INTEREST	16.76	98.76
12/28/2015	114.08				SUSPENSE		114.08	212.84
12/31/2015	-212.84				SUSPENSE		-212.84	-
12/31/2015	212.84				ESCROW		212.84	-
2/1/2016	112.96				SUSPENSE		112.96	112.96
3/4/2016	112.09				SUSPENSE		112.09	225.05
4/5/2016	366.07				SUSPENSE		366.07	591.12
5/4/2016	45.29				SUSPENSE		45.29	636.41
5/4/2016	315.31				SUSPENSE		315.31	951.72
6/1/2016	60.18				SUSPENSE		60.18	1,011.90

Loan Number

6/1/2016	364.21				SUSPENSE	364.21	1,376.11
7/6/2016	65.77				SUSPENSE	65.77	1,441.88
7/6/2016	353.36				SUSPENSE	353.36	1,795.24
8/2/2016	414.37				SUSPENSE	414.37	2,209.61
8/31/2016	410.10				SUSPENSE	410.10	2,619.71
Next Post-Petition Due Date				3/1/2015			
BKR Chapter							